



OFFICE OF PUBLIC INSTRUCTION

PO BOX 202501
HELENA MT 59620-2501
www.opi.mt.gov
(406) 444-3095
(888) 231-9393
(406) 444-0169 (TTY)

Linda McCulloch
Superintendent

August 2005

To: School Food Authority Administrators

From: Christine Emerson, Director
School Nutrition Programs

Re: **Instructions for Verification:** LEAs with **less than** 80% response rate in the previous year

Verification is the process by which Local Educational Agencies (LEAs) confirm the eligibility of a sample of approved applications for free and reduced-price meals. LEAs must submit the Summary of Verification form to this office by **December 15, 2005**. It is highly recommended that schools separate applications based on the categories listed on the Summary of Verification form (1.a through 2). Separating the applications as they come in will ease the verification procedure immensely.

With the new verification regulations, it is important to note the fine distinction between *calculating* the sample size and *drawing* the sample applications. *Calculate* the number of applications to be reviewed (the sample size) from **all** the applications except direct certifications (1.b. through 2 on Summary of Verification form). *Draw* the required number of applications from **only** the error-prone applications**. For more information, use the USDA's *Eligibility Guidance for School Meals Manual*: www.fns.usda.gov/cnd/Guidance/eligibility_guidance.pdf (starting on page 58) or call School Nutrition at (406) 444-2501.

The following forms are available on our Web site and are required to successfully complete the verification process. If you have trouble downloading any of these forms, please contact our office.

- Notification of Selection for Verification Letter (*front and back*)
- Notification of Results of Verification Letter

Verification does **not** apply to:

- Children in split-session kindergarten programs participating in the Special Milk Program;
- Residential Child Care Institutions, except for applications for attending day students; and
- Schools in non-base years using Special Provisions 2;
- *Households whose determinations were made through direct certification letters and lists;
- *Homeless, migrant and/or runaway students included on the respective liaison list; and
- *Non-applicants approved by local officials (Administrative Applications)

Please see the next page for instructions for the verification process. Thank you for your dedication to serving children nutritious meals. If you need assistance, please contact Holly Humphrey at (406) 444-4413 or hhumphrey@mt.gov; or Kim Pullman at (406) 444-3532 or kpullman@mt.gov.

Enclosures

"It is the mission of the Office of Public Instruction to improve teaching and learning through communication, collaboration, advocacy, and accountability to those we serve."

Timeline for Verification Activities:

Beginning of School Year-October 1

- Collect and approve applications for free and reduced-price meals.

October 1

Count the number of family applications approved for free and reduced-price meals (1.a. through 2) as of **October 1**. The number of students approved as Free Eligible through Direct Certification Letter or List, Homeless Liaison List or Administrative Application must also be documented. **Do not verify applications starred (*) in list on the cover memo.**

1. *Calculate* the sample size of 3 percent using **all** approved applications on file as of October 1 (1.b through 2). Round fractions up to whole numbers.
2. *Draw* the required number of applications from **only** the error prone applications**.
 - If there are more error-prone applications than needed for the minimum sample size, select a random sample from those applications.
 - If there are not enough error-prone applications to meet the minimum sample size, draw the remainder needed from among the other applications.
 - At least one income application must be verified, choosing error-prone applications first.
3. Once the applications have been drawn for verification, a “preliminary review” must be conducted. A person other than the determining official must check the applications pulled for verification to ensure that they were determined correctly before the verification process can proceed.
4. Send prototype notification letters to the selected households.
 - The family should have ten (10) working days to submit income documentation.
 - Adverse action letters must give ten (10) calendar days from issuance as the last day for appeal during which student’s eligibility may continue.
 - **If a household does not respond, schools must follow-up with that household at least once before that household is deemed non-responsive and meal benefits are ceased.** See “Decreasing the Burden of Verification.”
 - If a household selected for verification transfers out of the district before the information can be verified, a new application must be selected for verification.
5. Once responses have been received, re-determine the household’s benefits and send the prototype notification of results of verification letter to the households.

November 15

- All verification activity must be completed by **November 15** (numbers 1 through 5 above).

November 15-December 15

- Complete the Summary of Verification form and send to School Nutrition Programs by **December 15, 2005** (keep a copy on file at the school).

Keep copies of original applications, letters to households, and the Summary of Verification form.

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****Error-Prone Applications:** All schools with less than 80% response rate to verification in the previous year must verify 3% of error-prone applications. An error-prone application is an application approved on the basis of income, where the income is within \$100 monthly or \$1,200 annually of the Income Eligibility Guidelines cut-off points.

Please Note: The LEA has an obligation to verify all questionable applications (for cause). However, any verification that is done “for cause” is **in addition** to the sample required for the formal verification process (not to be included in random sampling).